

EXHIBIT 64

Confidential



Transcript of Tameka Ramsey Brown

Wednesday, May 25, 2022

National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.

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Reference Number: 116899

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----
4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,
5 MARY WINTER, GENE STEINBERG, NANCY HART, SARAH
6 WOLFF, KAREN SLAVEN, KATE KENNEDY, EDA DANIEL and
ANDREA SFERES,

7 Plaintiffs,

8 -and-
9

10 People of the STATE OF NEW YORK, by its Attorney
11 General, LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK

12 -vs-

13 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,
14 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,
ROBERT MAHANIAN and JOHN and JANE DOES 1-10

15 Defendants.
16 -----

17 CONFIDENTIAL

18 Deposition of TAMEKA RAMSEY BROWN, Plaintiff,
19 herein, taken by Defendant, pursuant to Notice via
20 Zoom, on Wednesday, May 25, 2022, at 10:00 a.m.,
21 before Deirdre Smith, a stenographer and notary
22 public within and for the State of New York.
23
24
25

1 A P P E A R A N C E S

2

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20 BY: RANDY KLEINMAN, ESQ.

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23

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1 A P P E A R A N C E S (continued)

2

3 LAWYERS COMMITTEE FOR CIVIL RIGHTS UNDER LAW

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17 BY: COLLEEN FERITY, ESQ.

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1 A. The Notice of Deposition. The original
2 complaint and the amended complaint.

3 Q. Besides those documents did you review
4 anything else?

5 A. Not that I remember. I don't remember the
6 names of all of the documents.

7 Q. No problem. I only want to know what you
8 remember and what you know, don't want you to guess,
9 that's fine. Are you employed?

10 A. Yes.

11 Q. Who are employed by?

12 A. All of them?

13 Q. Yes. You have multiple employers?

14 A. Yes.

15 Q. Why don't we go one by one.

16 A. Okay. I am the codirector for Michigan
17 Voices. I am the owner and principal consultant for
18 T. Ramsey and Associates. I also receive a stipend
19 from National Coalition on Black Civil Participation
20 as the lead convener for metro Detroit.

21 Q. Anything else?

22 A. No.

23 Q. So, let's start with the codirector. So
24 you're a codirector of something called Michigan
25 Voices?

1 program and not an organization, so Melanie Campbell
2 at the National assisted in creating the Michigan
3 coalition to house these programs.

4 Q. Okay. That makes sense. I guess the only
5 thing that I'm not understanding is because you
6 didn't use the national name, Detroit Metro, the
7 National Coalition on Black Civic Participation,
8 Detroit Metro Section, so where does that fit in and
9 what is the hierarchy?

10 A. Black Women's Roundtable is Metro Detroit,
11 it's called the Metro Detroit Black Women's
12 Roundtable. We have chapters in multiple cities in
13 metro Detroit.

14 Q. Thank you. Now I understand.

15 A. You're welcome.

16 Q. Who is Melanie Campbell by the way?

17 A. Melanie Campbell is the CEO and president
18 of the National Coalition on Black Civic
19 Participation and the Black Women's National
20 Roundtable convener.

21 Q. What is your relationship, if any, with
22 Ms. Campbell?

23 MR. EPSTEIN: Objection.

24 A. Professional or personal?

25 Q. Absolutely professional.

1 A. I receive newsletters, action, emails, and
2 attended events.

3 Q. Is it a paid membership?

4 A. No.

5 Q. Now, as the lead convener, and I believe,
6 is it, you are the lead convener for the Michigan
7 Coalition; is that correct?

8 A. Yes.

9 Q. What exactly does that role entail?

10 A. Fundraising, creating programs that are
11 derided from our national, and managing our
12 membership base.

13 Q. So, in this role what exactly do those
14 fundraising efforts entail?

15 A. Reaching out to potential funders.

16 Q. Who are these potential funders that
17 you're reaching out to?

18 A. Usually, these are funders that we have
19 heard about through our national conversations with
20 Melanie. Sometimes they are organizations for
21 foundations in states that want to support Black led
22 organizations.

23 Q. Do any of these funders include
24 individuals?

25 A. No.

1 Q. How about the Wilson Foundation?

2 A. Yes.

3 Q. How much did they provide?

4 A. Twenty five thousand dollars.

5 Q. Did they also provide funding in 2021?

6 A. No.

7 Q. How about 2022?

8 A. No.

9 Q. How about in-state foundations? Did you
10 receive any funding, did the Michigan coalition
11 receive any state funding from --

12 MR. KLEINMAN: Sorry, let me rephrase.

13 Q. Did the Michigan coalition receive any
14 funding from foundations, in-state, in 2020?

15 A. No.

16 Q. What other sources of funding, if any, did
17 the Michigan coalition receive in 2020?

18 A. I believe it was only the Wilson
19 Foundation, Michigan Voices and the national
20 Coalition.

21 Q. How much did the national Coalition
22 donate, approximately, in 2020?

23 A. Approximately, forty thousand dollars.

24 Q. So, is it fair to say that the Michigan
25 coalition's budget was approximately seventy-five to

1 eighty thousand dollars in 2020?

2 A. Yes.

3 Q. Just to be clear, did the Michigan
4 coalition in 2020 have any other source of funding
5 aside from what we've already discussed?

6 A. Not to my knowledge.

7 Q. In 2020 what did the Michigan coalition
8 spend its money on?

9 MR. EPSTEIN: Objection.

10 A. Buying materials for mutual aid events and
11 paying phone bankers and text bankers.

12 Q. When you say, materials for mutual aid,
13 what exactly does that mean?

14 A. Purchasing tissues, household cleaning
15 supplies, toilet paper, toothpaste, food.

16 Q. And were those items that were donated to
17 the community?

18 A. Yes.

19 Q. And in regard to the phone and text
20 bankers, what was the function of these individuals
21 in 2020?

22 A. They did most of the year on census.
23 Calling, talking to people around the census and
24 then in October -- in September, they started to do,
25 reminding people to vote calls and text messaging.

1 these chapters received in 2020?

2 A. No.

3 Q. Who made the decision on how to allocate
4 the funds in 2020?

5 A. I did.

6 Q. Would the allocations be memorialized
7 anywhere?

8 A. No.

9 Q. If I was to ask for a specific allocation
10 is there any way you could provide me with that?

11 A. No.

12 Q. Would it be reflected in bank records?

13 A. No.

14 Q. Is the Michigan coalition subject to any
15 type of governmental audit?

16 A. Not at this time.

17 Q. Are you required to save financial records
18 for any type of financial audit?

19 A. I assume so.

20 Q. So, is it fair to say that you would have
21 financial records regarding how the funds of the
22 Michigan coalition were spent in 2020 somewhere?

23 A. We have a fiscal sponsor who would have
24 some of that information. We are also, as you have
25 noted, a very lean organization and so there are

1 Census efforts?

2 MR. EPSTEIN: Objection.

3 A. I would say it would be over fifty
4 percent.

5 Q. And besides the November reminders to vote
6 and the census efforts undertaken by the Michigan
7 coalition in 2020, what -- and the materials, what
8 else, if anything, were the funds allocated on?

9 MR. EPSTEIN: Objection.

10 A. That was where all the funding went to,
11 those items.

12 Q. In November of 2020 how many phone and
13 text bankers, approximately, did the Michigan
14 coalition employ?

15 A. I believe we had -- so, the Michigan
16 coalition had, I believe, six. But we also
17 supported our cochair in Detroit and she had, I
18 believe, five to seven.

19 Q. Who was your cochair in Detroit in 2020?

20 A. Shaneta Gary.

21 Q. Where were you based, personally, in 2020?

22 A. Pontiac, Michigan.

23 Q. I'm sorry, can you just tell me the name
24 of your cochair one more time?

25 A. Shaneta Gary.

1 Q. And Ms. Gary is the cochair of the
2 Michigan coalition currently?

3 A. She is the cochair of the Black Women's
4 Roundtable, Metro Detroit.

5 Q. Are there any other cochairs chairs of the
6 Black Women's Roundtable, Metro Detroit?

7 A. Yes.

8 Q. Who are those individuals?

9 A. Autumn Butler is the cochair for Pontiac.
10 We no longer have cochairs in Flint and Saginaw.

11 Q. And have Ms. Gary and Ms. Butler been with
12 Michigan Coalition since 2020?

13 A. Yes. I believe they both came on prior to
14 that as members but they became cochairs in 2020.

15 Q. As lead convener are you a supervisor for
16 the cochairs?

17 A. Yes.

18 Q. Is lead convener a paid position?

19 A. Like employee? 1099s? Can you clarify?

20 Q. Sure. I believe, and I have to check, you
21 mentioned you received a stipend for this position?

22 A. Yes.

23 Q. And is this a yearly stipend?

24 A. It happens yearly. It's not consist.

25 Q. In 2020 did you receive a stipend for this

1 position?

2 A. Yes.

3 Q. Approximately, how much was that stipend?

4 A. I want to say it was twenty five hundred
5 dollars.

6 Q. Is that for the entire year?

7 A. Yes.

8 Q. Did cochairs in 2020, did they also
9 receive stipends?

10 A. No.

11 Q. In 2020 were there four cochairs?

12 A. There were eight cochairs.

13 Q. Do you recall the names of those eight
14 cochairs?

15 A. Not all of them but I can tell you who I
16 remember.

17 Q. Why don't we start there?

18 A. So, in Saginaw one of cochair was Keylana
19 Pitman. In Flint, Egypt Otis and Liberty Bell. In
20 Pontiac it was Autumn Butler and Teresa Tealy. And
21 in Detroit it was Shaneta Gary and Joni Collins.

22 Q. You did a pretty good job.

23 A. I missed somebody in Saginaw. I can't
24 remember her name.

25 (_____)

1 Q. I'm happy to leave a space.

2 MR. KLEINMAN: By the way Mark we call for
3 the 2020 fiscal records of Engage Michigan.

4 MR. EPSTEIN: I'm sure you will put that
5 in writing.

6 MR. KLEINMAN: Absolutely.

7 Q. Okay. As lead convener of the Michigan
8 coalition what exactly are your duties and
9 responsibilities?

10 A. Being responsible for understanding what
11 our goals are from the National coalition, and
12 bringing them and executing programs in the State of
13 Michigan.

14 Q. And in 2020 what were your goals?

15 A. To make sure that all Black people in our
16 respective states were counted for census and to
17 make sure that people voted in the November
18 election.

19 Q. And this objective was handed down from
20 the National coalition?

21 A. Yes.

22 Q. And who specifically handed down those
23 objectives?

24 A. We usually had a retreat and talked about
25 these things and they were agreed upon by the

1 Q. When did you make the determination that
2 the call contained false information?

3 A. So, there was a work group, Election
4 Protection work group that I was a part of. So when
5 the call came out and I read a part of it. I know
6 that people -- the secretary of state isn't going to
7 send the police to your house for a child support
8 warrant if you request an absentee ballot. Later
9 that day the secretary of state delivered a tweet
10 saying that the call in its entirety was false.

11 Q. So, this was August of 2020?

12 A. Yes.

13 Q. When you're saying the secretary of state,
14 who was that that issued that?

15 A. Jocelyn Vincent.

16 Q. Do you recall, approximately, the date
17 that that was issued?

18 A. No. I want to say it was the day that the
19 call went out or the day after.

20 Q. Do you have a copy that tweet?

21 A. Not on hand.

22 Q. Do you have one saved anywhere?

23 A. I believe I provided it to my attorney.

24 MR. KLEINMAN: Again, we'll request a copy
25 of it.

1 Q. Is there reason you didn't read the entire
2 transcript of the robocall in August of 2020?

3 A. Yes.

4 Q. What was the reason?

5 A. I have Adult ADHD and rarely read anything
6 in its entirety.

7 Q. So, is the reason that you did not read
8 the entirety of the robocall in 2020 is due to your
9 Adult ADHD?

10 A. Yes.

11 Q. Is it fair to say that your assessment, or
12 your conclusion, that the entirety of the robocall
13 was false was based on the secretary of state's
14 tweet?

15 MR. EPSTEIN: Objection.

16 A. No.

17 Q. What else helped facilitate that conclusion?

18 A. My knowledge on how elections are ran and
19 what the role of the state's election bureau is and
20 is not.

21 Q. Okay. And how did that knowledge affect
22 your opinion on the truth of the robocall?

23 A. Once again, I know that the secretary of
24 state is not going to send the names of everyone who
25 required an absentee ballot to friends of the Court

1 to have it crosschecked to see who has a warrant and
2 to go arrest them.

3 Q. And is it your understanding that the
4 robocall contained information making a statement
5 that said that in sum and substance?

6 A. It mentioned child support. It mentioned
7 warrants. I can't remember the order, but yes.

8 Q. Aside from those two things do you know
9 what else --

10 MR. KLEINMAN: Withdrawn.

11 Q. In August of 2020 besides those items that
12 you just highlighted did you know what else the
13 robocall had discussed?

14 A. I had heard some things but I didn't read
15 any. That's what I read.

16 Q. When you say, you heard some things, where
17 did you hear those things from?

18 A. Community members and friends.

19 Q. What type of things did you hear?

20 A. That if you vote -- that if you register
21 to get an absentee ballot that bill collectors would
22 call and harass you.

23 Q. Anything else?

24 A. No.

25 Q. Is it fair to say that in August of 2020

1 your understanding of the contents of the robocall
2 was derived mostly from outside sources?

3 MR. EPSTEIN: Objection.

4 A. When you say, mostly, what percentage
5 would you say?

6 Q. Well, why don't we do it like this, what
7 percentage of your understanding of the contents of
8 robocall in August of 2020 was based on your own
9 personal knowledge from reading the transcript?

10 A. So, I read about the warrants and child
11 support. So, once again it said if you applied for
12 an absentee ballot then these things would
13 specifically happen to you, and I knew that that was
14 false.

15 Q. So, what, if anything, did you do after
16 learning about the robocall on behalf of the
17 Michigan Coalition?

18 A. I reached out to my cochair, Shaneta Gary.

19 Q. How did you reach out to her? Was it a
20 call? An email? Something different?

21 A. A telephone call.

22 Q. What was discussed?

23 A. I asked her if she had heard, if she --
24 she lives in Detroit, I asked if she had received
25 the call or any her children, she has godchildren,

1 if they received the call or if she knew anybody who
2 had received the call.

3 Q. And what was her response?

4 A. That she was aware of a person who had
5 received the call.

6 Q. Do you know who that person was?

7 A. No.

8 Q. What happened next?

9 A. So, I asked her on behalf of the Michigan
10 coalition if she would be willing to do some phone
11 banking in the City of Detroit to talk to people
12 about this, about this robocall.

13 Q. What did she say?

14 A. Yes.

15 Q. And when you say, phone banking, what
16 exactly is it that you had intended?

17 A. So, Ms. Gary was already running a census
18 phone, calling people in the Detroit community to
19 make sure they were completing their census form,
20 and I asked her if she could redesignate some of the
21 people making those call to make this call regarding
22 the robocall.

23 Q. Did she agree to do that?

24 A. Yes.

25 Q. And that was just in the Detroit area?

1 A. Yes.

2 Q. And those phone banks in the Detroit area,
3 is it fair to say they received funding from the
4 Michigan coalition?

5 A. Yes.

6 Q. Did the Michigan coalition allocate funds
7 to any other area of Michigan as a result of the
8 calls?

9 A. No.

10 Q. So, the entirety of the Michigan
11 coalition's allocation of funds stemming from the
12 robocall was focused in Detroit?

13 A. For that time period. Because of the
14 robocalls we changed our script for the entire state
15 to include this when we started making calls for
16 GOTV in November.

17 Q. So, what was the approximate date that you
18 changed the script?

19 A. I don't recall. We wrote a script
20 specifically for these robocalls, and then when we
21 went to do GOTV in September we just wrote up that
22 script into our other phone banks across the state.

23 Q. I understand. Do you have a copy of this
24 script?

25 A. My attorney does.

1 MR. KLEINMAN: We will call for a copy of
2 that. I'll followup in writing.

3 Q. So, do you recall the date you solicited,
4 the approximate date you solicited Detroit phone
5 bankers to start making these calls stemming from
6 the robocall in August?

7 A. I don't know.

8 MR. EPSTEIN: Objection.

9 A. I don't know the specific date. I know it
10 was the date that the robocalls were made.

11 Q. Okay. So, the calls in the Detroit area
12 that you commissioned, those followed the date of
13 the robocall, correct?

14 A. Yes.

15 Q. So, if I told you the robocall was made on
16 August 26, 2020, is it fair to say that the calls
17 you commissioned in Detroit were after that date?

18 A. Yes.

19 Q. And then did those calls continue through
20 and including November? Is that fair?

21 A. Can you please repeat that?

22 Q. The calls commissioned to Detroit with the
23 new script, those calls continued through and
24 including November of 2020?

25 A. Yes.

1 Q. Okay. So, now, prior to the robocall was
2 there a script in place that was going to be used
3 for these Get Out The Vote efforts in Michigan?

4 A. Yes.

5 Q. And that script was subsequently changed
6 after the August 26, 2020 robocall?

7 MR. EPSTEIN: Objection.

8 A. Yes.

9 Q. But is it fair to say that the Michigan
10 coalition's GOTV efforts, irrespective of the
11 robocall, were going to take place on or about
12 September 1, 2020?

13 A. On or about, yes.

14 Q. As a result of the robocall -- did the
15 Michigan coalition's Get Out The Vote efforts start
16 earlier as a result of the robocall?

17 A. Yes.

18 Q. And were these efforts in areas besides
19 Detroit or did it include all of Michigan or
20 something different?

21 A. Just Detroit.

22 Q. So, between approximately August 26, 2020
23 and, approximately, September 1, 2020, the Get Out
24 The Vote efforts started in Detroit? Is that
25 correct?

1 A. Yes.

2 Q. And those efforts were premature? Is that
3 correct?

4 MR. EPSTEIN: Objection.

5 A. Yes.

6 Q. Or shall I say those efforts started
7 earlier than you had expected; is that fair?

8 A. Yes.

9 Q. Approximately, how much money was
10 allocated on those Get Out The Vote efforts between
11 August 26, 2020 and on or about September 1, 2020?

12 A. I don't recall the specific amount.

13 Q. Okay. Do you recall an approximate
14 amount?

15 A. No. The amount, the funding that was
16 spent was spent by several organizations.

17 Q. Who were those organizations?

18 A. The Michigan Coalition On Black Civic
19 Participation and Michigan Voices.

20 Q. Do you know who would have the financial
21 information regarding that time period and the GOTV
22 efforts?

23 A. I don't think we keep records like that.

24 Q. Okay. Would Engage Michigan have those
25 records?

1 A. No.

2 Q. Did the August 26, 2020 robocall change
3 the Michigan Coalition's overall budget?

4 A. No.

5 Q. Did the -- I'm just going to say the
6 August 2020 robocall. So, did the August 2020
7 robocall change the allocation of the Michigan
8 coalition's overall budget?

9 A. Yes.

10 Q. How so?

11 A. When I called Ms. Gary to see if she could
12 reallocate some of her team to make the robocalls we
13 knew that we needed to write the script, we needed
14 to get the tools together for them to be able to
15 make these calls and transition them from census to
16 talking about absentee ballots.

17 Q. How much did that change the overall
18 allocation of the budget?

19 A. How much?

20 Q. Approximately?

21 A. I would say between, I want to say about
22 ten thousand, maybe twenty thousand dollars.

23 Q. And how did it change the overall budget
24 ten to twenty thousand dollars?

25 A. So, myself and Ms. Gary had to reallocate

1 our time to focus on the robocall, create the
2 script, figure out who we should be talking to. It
3 was a little difficult with the script creation
4 because we didn't want to respread what we thought
5 was a lie, so we had to write a script that did not
6 address what was said, we had to make sure we had
7 the tools and technology in order to do that. I had
8 to speak with Melanie Campbell to make her aware of
9 what was going on and to make sure we could do this
10 work in the name of the Michigan coalition.

11 Q. You mentioned the tools and technology.
12 What tools and technology specifically are you
13 referring to?

14 A. I believe her team was using, ThruTalk,
15 which is an automated dialer.

16 Q. So, this ten to twenty thousand dollars
17 that you reference, was that money that you had to
18 spend out-of-pocket or is that your estimate of how
19 much, the time you allocated on addressing the
20 robocall in August?

21 A. So, it includes time, it also includes the
22 reallocation of the ThruTalk tools, and the paid
23 time of the staff who went from census calling to
24 absentee ballot calling.

25 Q. Those callers who went from census to Get

1 Out The Vote efforts, were they going to be working
2 irrespective of the August robocall?

3 A. Yes.

4 Q. Did you have to add any additional callers
5 as a result of the August robocall?

6 A. No -- I'm sorry, yes. Because Ms. Gary,
7 who was not an initial phone banker, also started
8 making calls as well.

9 Q. So, Ms. Gary personally started making
10 additional robocalls?

11 A. Started making calls, yes.

12 Q. And she was paid for those efforts?

13 A. I don't know. I don't know. We do a lot
14 of volunteer stuff. It was a part of her stipend
15 but I don't know if she was personally paid.

16 Q. Did you have to commission any additional
17 callers to address the August 2020 robocall?

18 A. No.

19 Q. And the ThruTalk reallocation you
20 mentioned, that was a reallocation from census to
21 voting, right?

22 A. Through absentee ballots, yes.

23 Q. So, how did that cost money?

24 A. Michigan Voices had allocated a certain
25 number of dials to this, to her organization. Ms.

1 Gary's organization only had a certain number of
2 dials that they were making. Because I asked her to
3 make these calls on behalf of Black Women's
4 Roundtable, Michigan Voices reallocated more dials
5 to her.

6 Q. How much money, approximately, did those
7 redials cost?

8 A. I don't know.

9 Q. Was it more than ten thousand or less than
10 ten thousand?

11 A. Less.

12 Q. Was it more than five thousand or less
13 than five thousand?

14 A. I don't know.

15 Q. So, is it fair to say somewhere between
16 five and ten thousand or you don't know? I don't
17 want you to guess.

18 A. Yeah, I don't know.

19 Q. What is ThruTalk?

20 A. ThruTalk is an automated dialer that
21 allows individuals to connect directly with the
22 person and they do not have to dial the numbers
23 themselves, individually.

24 Q. Is it fair to say the calls made through
25 ThruTalk are robocalls?

1 MR. KLEINMAN: Okay.

2 Q. At any point in time, well, can you speak
3 to whether you know whether representatives from the
4 National coalition spoke to any government entity or
5 can you only speak with regard to the Michigan
6 coalition on that?

7 MR. EPSTEIN: Objection.

8 A. I can only speak to the Michigan
9 coalition.

10 Q. So, at any point in time has the Michigan
11 coalition spoken to any governmental entity about
12 the August 2020 robocall?

13 A. No.

14 Q. Okay. Just to be clear, is it fair to say
15 that the Michigan coalition, a representative from
16 the Michigan coalition, has not spoken with any
17 attorney general's office, any prosecutor's office,
18 Federal Election Committee, Federal Communications
19 Committee, none of those entities?

20 A. No.

21 Q. Okay. In your capacity as the, in your
22 capacity for the Michigan coalition, who else, if
23 anyone, have you spoken to about the August 2020
24 robocall?

25 A. So, there was an Election Protection work

1 group that I sat on and I spoke with that work
2 group. I also spoke with Ms. Gary. I also have
3 personal relationships with a number of people who
4 live in Detroit, so I called to do some information
5 gathering there as well.

6 Q. Okay. And I don't want to know anything
7 you already testified to so just with regard with
8 the Election Protection work group is there anything
9 that you discussed with them that you haven't
10 already talked about here?

11 A. No.

12 Q. Same thing with Ms. Gary, did you discuss
13 anything else that you haven't already discussed
14 here?

15 MR. EPSTEIN: Objection.

16 A. No.

17 Q. Now, the individuals that received this
18 call throughout Detroit, do you recall anyone in
19 particular who you spoke to?

20 A. No.

21 Q. Do you recall whether you spoke to anyone
22 in the Black community who received the call?

23 A. Yes.

24 Q. Do you recall who, specifically?

25 A. It was my girlfriend, one of her children.

1 Q. And was this an adult child?

2 A. Yes.

3 Q. And what was the sum and substance of your
4 conversation with this friend? What was the
5 friend's name?

6 A. Shanay.

7 Q. Does Shanay have a last name that you
8 know?

9 A. Watson-Whittaker.

10 Q. What exactly was the sum and substance of
11 your conversation with Ms. Watson-Whittaker?

12 A. So, I called her to ask if she had
13 received the call or knew anyone who did and she
14 said that one of her godchildren had.

15 Q. Is that the entirety of your conversation?

16 A. I think we had a few choice words to say
17 about our thoughts on the robocall and her asking
18 how was this going to be handle.

19 Q. When she asked how it was going to be
20 handle how did you respond?

21 A. That Black Women's Roundtable would be
22 making calls but we had to work on a script because
23 we did not want to continue to spread what we
24 believe was a lie, so we had to work on that.

25 Q. And what exactly did you mean by, you had

1 some choice words?

2 A. We were frustrated.

3 Q. Did you speak to Ms. Watson-Whittaker's
4 son about the robocall he received?

5 A. I don't know if it was her son. I know it
6 was her godchild. I did not speak with them
7 directly.

8 Q. Did Ms. Watson-Whittaker indicate how her
9 adult child felt about receiving the call?

10 A. Yes.

11 Q. What did she indicate?

12 A. That there was an attack on Black men in
13 the City of Detroit.

14 Q. You said on Black men?

15 A. Yes.

16 Q. Do you know why her adult child believed
17 it was an assault on Black men in particular?

18 A. No.

19 Q. Okay. Did you ask?

20 A. No.

21 Q. Okay. Do you know why Ms.
22 Watson-Whittaker's child is not a Plaintiff in this
23 lawsuit?

24 A. No.

25 Q. What, if anything, do you know about the

1 evidence that this concern actually came to
2 fruition?

3 A. No.

4 Q. Does the Michigan coalition believe that
5 voting in-person was more dangerous than going to
6 the supermarket?

7 MR. EPSTEIN: Objection.

8 A. Can you repeat?

9 Q. Yes, does the Michigan coalition believe
10 that voting in-person is more dangerous than going
11 to the supermarket?

12 MR. EPSTEIN: Objection.

13 A. No, we felt they were equally dangerous at
14 that time.

15 Q. In August, from August through November of
16 2020 did the Michigan coalition believe that voting
17 was less important than going to the supermarket?

18 MR. EPSTEIN: Objection.

19 A. I don't believe so.

20 Q. Between August 2020 and November of 2020
21 did the Michigan coalition believe that it was more,
22 that voting in-person was more dangerous than going
23 to the bank?

24 MR. EPSTEIN: Objection.

25 A. We felt it was equally as dangerous.

1 A. I believe there were a number of issues.

2 Q. What were those issues?

3 A. There was a global pandemic happening.

4 Black people have a distrust of the census already.

5 And the information and date -- well, information of

6 what questions would be asked kept changing and the

7 deadline to end the census was a moving target as

8 well.

9 Q. So, those reasons you just articulated,
10 did any of them have anything to do with the August
11 of 2020 robocall?

12 A. No.

13 Q. Do you have any evidence that August of
14 2020 robocall effected how many people completed the
15 census in 2020?

16 A. No, but I don't have any data that
17 concludes any of the other four things that I
18 mentioned did either.

19 Q. Sure. Is it your contention that the
20 August 2020 robocall effected how many people
21 completed the census?

22 MR. EPSTEIN: Objection.

23 A. It effected our time on doing the work
24 around the census. And that's all I can speak to.

25 Q. Is it fair to say that any statement that

C E R T I F I C A T I O N

THIS IS TO CERTIFY, THAT I, DEIRDRE M. SMITH,
on Wednesday, May 25th of 2022, reported the
proceedings contained in the foregoing 108 pages at
the time and place as set forth in the heading in
the foregoing matter. That the transcript is a true
and accurate transcription of my stenographic notes,
using Computer Aided Transcription, to the best of
my ability.

IN WITNESS WHEREOF, I have hereunto set my had
this 9th day of June, 2022.

Deirdre Smith

Deirdre M. Smith